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UNITED STATES BANKRUPTCY COURT

CENTRAL DISTRICT OF CALIFORNIA

SANTA ANA DIVISION

In re:

The Litigation Practice Group P.C.,

Debtor.

Richard A. Marshack, Trustee of the LPG
Liquidation Trust,

Plaintiff,

v.

Oxford Knox, LLC, a Delaware limited liability company; Buffalo 21 Partners, Inc., a Wyoming corporation; Rick Emmett, individually; Ryan Taylor Connet, individually; Obrik, Inc., a Wyoming corporation; Albright, Inc., a Florida corporation; Jason Dovalina, individually; Rachel Dovalina, individually; Final Season, Inc., a California corporation; Factor In, Inc., a California corporation; Syed Faisal Gilani aka Sye Gilani, individually; BAE Enterprises, Inc., a Wyoming corporation; Rose Bianca Loli, individually; Decacorn Holdings, Inc., a California limited liability company; Samson Ly, individually; BEW Solar Management, LLC, a California limited liability company; Sean Stephens, individually; Lexicon Consulting, LLC, a California corporation; Daniel Lansdale, individually; United Partnerships, LLC, a California corporation; Ventura Consulting, LLC, a Nevada limited liability; Matthew Church,

Chapter 11

Case No. 8:23-bk-10571-SC

Adv No. 8:25-ap-01208-SC

**CERTAIN DEFENDANTS' ANSWER TO
TRUSTEE'S AMENDED COMPLAINT
FOR:**

- (1) AVOIDANCE, RECOVERY, AND PRESERVATION OF PREFERENTIAL TRANSFERS MADE TO OR FOR CERTAIN DEFENDANTS MADE WITHIN NINETY DAYS OF THE PETITION DATE;**
- (2) (2) AVOIDANCE, RECOVERY, AND PRESERVATION OF POST-PETITION TRANSFERS MADE TO OR FOR THE BENEFIT OF CERTAIN DEFENDANTS;**
- (3) (2) AVOIDANCE OF DEBTOR'S EXECUTION OF REPAYMENT AGREEMENT WITH DEFENDANT OXFORD KNOX, LLC PURSUANT TO 11 U.S.C. §§ 548(A), 550, AND 551;**
- (4) AVOIDANCE, RECOVERY, AND PRESERVATION OF FRAUDULENT TRANSFER(S) PURSUANT TO 11 U.S.C. §§ 548(A), 550, AND 551;**
- (5) AVOIDANCE, RECOVERY, AND PRESERVATION OF FRAUDULENT TRANSFER(S) PURSUANT TO 11 U.S.C. §§ 548(A), 550, AND 551;**
- (6) AVOIDANCE, PRESERVATION, AND RECOVERY OF VOIDABLE**

individually; Frank Brown, individually;
Validation, LLC, a terminated California limited
liability company; Innovative Solutions, LLC, a
Wyoming corporation; MRJR20 Partners, LLC, a
California limited liability company; MFCR,
Investments, LLC, a Florida limited liability
company; Lifesize, Inc., a Wyoming corporation.;
Karrington, Inc., a Wyoming corporation;
Spectrum Payment Solutions, LLC, a California
limited liability company; Jason D. Williams,
individually; Home Energy Solutions, Inc., a
California corporation; The Coelho Irrevocable
Life Insurance Trust, a California trust; JNR
Services, Inc., a California corporation; C.A.T.
Exteriors, Inc., an Arizona corporation; AZLS
Enterprises, Inc, a California corporation; A
Solution Debt Relief, Inc., a Wyoming
corporation and INVESTLINC Wealth Services,
Inc., a California corporation,

Defendants.

**TRANSFERS MADE WITH INTENT
TO DEFRAUD [11 U.S.C. §§ 548. (A),
550, AND 551; CAL. CIV. CODE
§§.04(A)(2), 3439, 3439AND 3439.07]
(7) AVOIDANCE, PRESERVATION,
AND RECOVERY OF VOIDABLE
TRANSFERS MADE WITH NO
INTENT TO DEFRAUD [11U.S.C. §§
548(A), 550, AND 551; OCAL. CIV.
CODE §§ 3439.04(A)(2), 3439.05, AND
3439.07]
(8) AVOIDANCE, RECOVERY, AND
PRESERVATION OF FRAUDULENT
TRANSFERS MADE TO OR FOR
THE BENEFIT OF DEFENDANTS
GILANI AND DOVALINA ARISING
FROM USE OF AMERICAN
EXPRESS CARD; AND
(9) OBJECTION TO PROOF OF CLAIM
NO 818 OF OXFORD KNOX, LLC**

Honorable Scott C. Clarkson
Dept. 5C

Defendants Oxford Knox, LLC, a Delaware limited liability company; Buffalo 21 Partners,
Inc., a Wyoming corporation; Jason Dovalina, individually; Rachel Dovalina, individually; Syed
Faisal Gilani aka Sye Gilani, individually; BAE Enterprises, Inc., a Wyoming corporation; Samson
Ly, individually; BEW Solar Management, LLC, a California limited liability company; Matthew
Church, individually; Frank Brown, individually; Validation, LLC, a terminated California limited
liability company; Spectrum Payment Solutions, LLC, a California limited liability company; Home
Energy Solutions, Inc., a California corporation; JNR Services, Inc., a California corporation; C.A.T.
Exteriors, Inc., an Arizona corporation; AZLS Enterprises, Inc, a California corporation; and
INVESTLINC Wealth Services, Inc., a California corporation, (collectively “Defendants”) hereby
files this joint answer to the *(Trustee’s Second Amended Complaint for (1) Avoidance Preservation
Of Preferential, Recovery, And Transfers Made to or for Certain Defendants Made Within Ninety
Days of the Petition Date;(2) Avoidance, Recovery, and Preservation of Post-Petition Transfers Made
to or for the Benefit Of Certain Defendants;(3) Avoidance of Debtor’s Execution of Repayment
Agreement with Defendant Oxford Know, LLC Pursuant To 11 U.S.C. §§ 548(a), 550, and
551;(4)Avoidance, Recovery, And Preservation Of Fraudulent Transfer(S) Pursuant To 11 U.S.C. §§
548(a), 550,and 551;(5) Avoidance, Recovery, and Preservation Of Fraudulent Transfer(s) Pursuant
To 11 U.S.C. §§ 548(a), 550, and 551;(6) Avoidance Voidable, Preservation, and Recovery of*

1 *Transfers Made With Intent To Defraud [11 U.S.C. §§ 548 (a), 550, and 551; Cal. Civ. Code*
2 *§§.04(a)(2), 3439, 3439 and 3439.07]; ((7)Avoidance, Preservation, and Recovery of Voidable*
3 *Transfers Made With No Intent to Defraud [11U..S.C. §§ 548(a), 550, and 551; Cal. Civ. Code§§*
4 *3439.04(A)(2), 3439.05, And 3439.07]; (8) Avoidance, Recovery, and Preservation of Fraudulent*
5 *Transfers Made to or for the Benefit of Defendants Gilani and Dovalina Arising From Use of*
6 *American Express Card; and (9) Objection To Proof Of Claim No 818 Of Oxford Know, LLC (the*
7 *“Complaint”) of Plaintiff Richard A. Marshack, Trustee of the LPG Liquidation Trust (“Plaintiff”),*
8 *as follows:*

9 **ANSWERS AND DENIALS**

10 1. Answering the allegations of paragraph 1, Defendants admit the allegations set forth
11 therein.

12 2. Answering the allegations of paragraph 2, Defendants are without sufficient
13 knowledge or information to form a belief as to the truth of the allegations asserted and therefore
14 deny the allegations.

15 3. In response to Paragraph 3, Defendants state that such paragraph contains statements
16 or conclusions of law to which no response is required.

17 4. In response to Paragraph 4, Defendants state that such paragraph contains statements
18 or conclusions of law to which no response is required.

19 5. Answering the allegations of paragraph 5, Defendants are without sufficient
20 knowledge or information to form a belief as to the truth of the allegations asserted and therefore
21 deny the allegations.

22 6. Answering the allegations of paragraph 6, Defendants admit the allegations contained
23 therein.

24 7. Answering the allegations of paragraph 7, Defendants admit that it may be served by
25 first class mail postage prepaid upon its Partnership Representative: Richard R. Emmett, 251 Little
26 Falls Drive, Wilmington, Delaware, 19808.

27 8. Although Defendants generally believes the allegations contained in Paragraph 8 of
28 the Complaint to be true, Defendants are without sufficient knowledge or information to form a belief
as to the truth of the allegations asserted and therefore deny the allegations.

1 9. Although Defendants generally believes the allegations contained in Paragraph 9 of
2 the Complaint to be true, Defendants are without sufficient knowledge or information to form a belief
3 as to the truth of the allegations asserted and therefore deny the allegations.

4 10. Although Defendants generally believes the allegations contained in Paragraph 10 of
5 the Complaint to be true, Defendants are without sufficient knowledge or information to form a belief
6 as to the truth of the allegations asserted and therefore deny the allegations.

7 11. Although Defendants generally believes the allegations contained in Paragraph 11 of
8 the Complaint to be true, Defendants are without sufficient knowledge or information to form a belief
9 as to the truth of the allegations asserted and therefore deny the allegations.

10 12. Although Defendants generally believes the allegations contained in Paragraph 12 of
11 the Complaint to be true, Defendants are without sufficient knowledge or information to form a belief
12 as to the truth of the allegations asserted and therefore deny the allegations.

13 13. Although Defendants generally believes the allegations contained in Paragraph 13 of
14 the Complaint to be true, Defendants are without sufficient knowledge or information to form a belief
15 as to the truth of the allegations asserted and therefore deny the allegations.

16 14. Although Defendants generally believes the allegations contained in Paragraph 14 of
17 the Complaint to be true, Defendants are without sufficient knowledge or information to form a belief
18 as to the truth of the allegations asserted and therefore deny the allegations.

19 15. Although Defendants generally believes the allegations contained in Paragraph 15 of
20 the Complaint to be true, Defendants are without sufficient knowledge or information to form a belief
21 as to the truth of the allegations asserted and therefore deny the allegations.

22 16. Although Defendants generally believes the allegations contained in Paragraph 16 of
23 the Complaint to be true, Defendants are without sufficient knowledge or information to form a belief
24 as to the truth of the allegations asserted and therefore deny the allegations.

25 17. Although Defendants generally believes the allegations contained in Paragraph 17 of
26 the Complaint to be true, Defendants are without sufficient knowledge or information to form a belief
27 as to the truth of the allegations asserted and therefore deny the allegations.

28

1 18. Although Defendants generally believes the allegations contained in Paragraph 18 of
2 the Complaint to be true, Defendants are without sufficient knowledge or information to form a belief
3 as to the truth of the allegations asserted and therefore deny the allegations.

4 19. Although Defendants generally believes the allegations contained in Paragraph 19 of
5 the Complaint to be true, Defendants are without sufficient knowledge or information to form a belief
6 as to the truth of the allegations asserted and therefore deny the allegations.

7 20. Although Defendants generally believes the allegations contained in Paragraph 20 of
8 the Complaint to be true, Defendants are without sufficient knowledge or information to form a belief
9 as to the truth of the allegations asserted and therefore deny the allegations.

10 21. Although Defendants generally believes the allegations contained in Paragraph 21 of
11 the Complaint to be true, Defendants are without sufficient knowledge or information to form a belief
12 as to the truth of the allegations asserted and therefore deny the allegations.

13 22. Although Defendants generally believes the allegations contained in Paragraph 22 of
14 the Complaint to be true, Defendants are without sufficient knowledge or information to form a belief
15 as to the truth of the allegations asserted and therefore deny the allegations.

16 23. Although Defendants generally believes the allegations contained in Paragraph 23 of
17 the Complaint to be true, Defendants are without sufficient knowledge or information to form a belief
18 as to the truth of the allegations asserted and therefore deny the allegations.

19 24. Although Defendants generally believes the allegations contained in Paragraph 24 of
20 the Complaint to be true, Defendants are without sufficient knowledge or information to form a belief
21 as to the truth of the allegations asserted and therefore deny the allegations.

22 25. Although Defendants generally believes the allegations contained in Paragraph 25 of
23 the Complaint to be true, Defendants are without sufficient knowledge or information to form a belief
24 as to the truth of the allegations asserted and therefore deny the allegations.

25 26. Although Defendants generally believes the allegations contained in Paragraph 26 of
26 the Complaint to be true, Defendants are without sufficient knowledge or information to form a belief
27 as to the truth of the allegations asserted and therefore deny the allegations.

28

1 27. Although Defendants generally believes the allegations contained in Paragraph 27 of
2 the Complaint to be true, Defendants are without sufficient knowledge or information to form a belief
3 as to the truth of the allegations asserted and therefore deny the allegations.

4 28. Although Defendants generally believes the allegations contained in Paragraph 28 of
5 the Complaint to be true, Defendants are without sufficient knowledge or information to form a belief
6 as to the truth of the allegations asserted and therefore deny the allegations.

7 29. Although Defendants generally believes the allegations contained in Paragraph 29 of
8 the Complaint to be true, Defendants are without sufficient knowledge or information to form a belief
9 as to the truth of the allegations asserted and therefore deny the allegations.

10 30. Although Defendants generally believes the allegations contained in Paragraph 30 of
11 the Complaint to be true, Defendants are without sufficient knowledge or information to form a belief
12 as to the truth of the allegations asserted and therefore deny the allegations.

13 31. Although Defendants generally believes the allegations contained in Paragraph 31 of
14 the Complaint to be true, Defendants are without sufficient knowledge or information to form a belief
15 as to the truth of the allegations asserted and therefore deny the allegations.

16 32. Although Defendants generally believes the allegations contained in Paragraph 32 of
17 the Complaint to be true, Defendants are without sufficient knowledge or information to form a belief
18 as to the truth of the allegations asserted and therefore deny the allegations.

19 33. Although Defendants generally believes the allegations contained in Paragraph 33 of
20 the Complaint to be true, Defendants are without sufficient knowledge or information to form a belief
21 as to the truth of the allegations asserted and therefore deny the allegations.

22 34. Although Defendants generally believes the allegations contained in Paragraph 34 of
23 the Complaint to be true, Defendants are without sufficient knowledge or information to form a belief
24 as to the truth of the allegations asserted and therefore deny the allegations.

25 35. Although Defendants generally believes the allegations contained in Paragraph 35 of
26 the Complaint to be true, Defendants are without sufficient knowledge or information to form a belief
27 as to the truth of the allegations asserted and therefore deny the allegations.

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1 36. Although Defendants generally believes the allegations contained in Paragraph 36 of
2 the Complaint to be true, Defendants are without sufficient knowledge or information to form a belief
3 as to the truth of the allegations asserted and therefore deny the allegations.

4 37. Although Defendants generally believes the allegations contained in Paragraph 37 of
5 the Complaint to be true, Defendants are without sufficient knowledge or information to form a belief
6 as to the truth of the allegations asserted and therefore deny the allegations.

7 38. Although Defendants generally believes the allegations contained in Paragraph 38 of
8 the Complaint to be true, Defendants are without sufficient knowledge or information to form a belief
9 as to the truth of the allegations asserted and therefore deny the allegations.

10 39. Although Defendants generally believes the allegations contained in Paragraph 39 of
11 the Complaint to be true, Defendants are without sufficient knowledge or information to form a belief
12 as to the truth of the allegations asserted and therefore deny the allegations.

13 40. Although Defendants generally believes the allegations contained in Paragraph 40 of
14 the Complaint to be true, Defendants are without sufficient knowledge or information to form a belief
15 as to the truth of the allegations asserted and therefore deny the allegations.

16 41. Although Defendants generally believes the allegations contained in Paragraph 41 of
17 the Complaint to be true, Defendants are without sufficient knowledge or information to form a belief
18 as to the truth of the allegations asserted and therefore deny the allegations.

19 42. Although Defendants generally believes the allegations contained in Paragraph 42 of
20 the Complaint to be true, Defendants are without sufficient knowledge or information to form a belief
21 as to the truth of the allegations asserted and therefore deny the allegations.

22 43. Although Defendants generally believes the allegations contained in Paragraph 43 of
23 the Complaint to be true, Defendants are without sufficient knowledge or information to form a belief
24 as to the truth of the allegations asserted and therefore deny the allegations.

25 44. Although Defendants generally believes the allegations contained in Paragraph 44 of
26 the Complaint to be true, Defendants are without sufficient knowledge or information to form a belief
27 as to the truth of the allegations asserted and therefore deny the allegations.

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1 45. Although Defendants generally believes the allegations contained in Paragraph 45 of
2 the Complaint to be true, Defendants are without sufficient knowledge or information to form a belief
3 as to the truth of the allegations asserted and therefore deny the allegations.

4 46. Although Defendants generally believes the allegations contained in Paragraph 46 of
5 the Complaint to be true, Defendants are without sufficient knowledge or information to form a belief
6 as to the truth of the allegations asserted and therefore deny the allegations.

7 47. Although Defendants generally believes the allegations contained in Paragraph 47 of
8 the Complaint to be true, Defendants are without sufficient knowledge or information to form a belief
9 as to the truth of the allegations asserted and therefore deny the allegations.

10 48. Although Defendants generally believes the allegations contained in Paragraph 48 of
11 the Complaint to be true, Defendants are without sufficient knowledge or information to form a belief
12 as to the truth of the allegations asserted and therefore deny the allegations.

13 49. Although Defendants generally believes the allegations contained in Paragraph 49 of
14 the Complaint to be true, Defendants are without sufficient knowledge or information to form a belief
15 as to the truth of the allegations asserted and therefore deny the allegations.

16 50. Although Defendants generally believes the allegations contained in Paragraph 50 of
17 the Complaint to be true, Defendants are without sufficient knowledge or information to form a belief
18 as to the truth of the allegations asserted and therefore deny the allegations.

19 51. Although Defendants generally believes the allegations contained in Paragraph 51 of
20 the Complaint to be true, Defendants are without sufficient knowledge or information to form a belief
21 as to the truth of the allegations asserted and therefore deny the allegations.

22 52. Although Defendants generally believes the allegations contained in Paragraph 52 of
23 the Complaint to be true, Defendants are without sufficient knowledge or information to form a belief
24 as to the truth of the allegations asserted and therefore deny the allegations.

25 53. Although Defendants generally believes the allegations contained in Paragraph 53 of
26 the Complaint to be true, Defendants are without sufficient knowledge or information to form a belief
27 as to the truth of the allegations asserted and therefore deny the allegations.

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1 54. Although Defendants generally believes the allegations contained in Paragraph 54 of
2 the Complaint to be true, Defendants are without sufficient knowledge or information to form a belief
3 as to the truth of the allegations asserted and therefore deny the allegations.

4 55. Although Defendants generally believes the allegations contained in Paragraph 55 of
5 the Complaint to be true, Defendants are without sufficient knowledge or information to form a belief
6 as to the truth of the allegations asserted and therefore deny the allegations.

7 56. Although Defendants generally believes the allegations contained in Paragraph 56 of
8 the Complaint to be true, Defendants are without sufficient knowledge or information to form a belief
9 as to the truth of the allegations asserted and therefore deny the allegations.

10 57. Although Defendants generally believes the allegations contained in Paragraph 57 of
11 the Complaint to be true, Defendants are without sufficient knowledge or information to form a belief
12 as to the truth of the allegations asserted and therefore deny the allegations.

13 58. Although Defendants generally believes the allegations contained in Paragraph 58 of
14 the Complaint to be true, Defendants are without sufficient knowledge or information to form a belief
15 as to the truth of the allegations asserted and therefore deny the allegations.

16 59. Although Defendants generally believes the allegations contained in Paragraph 59 of
17 the Complaint to be true, Defendants are without sufficient knowledge or information to form a belief
18 as to the truth of the allegations asserted and therefore deny the allegations.

19 60. Although Defendants generally believes the allegations contained in Paragraph 60 of
20 the Complaint to be true, Defendants are without sufficient knowledge or information to form a belief
21 as to the truth of the allegations asserted and therefore deny the allegations.

22 61. Although Defendants generally believes the allegations contained in Paragraph 61 of
23 the Complaint to be true, Defendants are without sufficient knowledge or information to form a belief
24 as to the truth of the allegations asserted and therefore deny the allegations.

25 62. Although Defendants generally believes the allegations contained in Paragraph 62 of
26 the Complaint to be true, Defendants are without sufficient knowledge or information to form a belief
27 as to the truth of the allegations asserted and therefore deny the allegations.

28

1 63. Although Defendants generally believes the allegations contained in Paragraph 63 of
2 the Complaint to be true, Defendants are without sufficient knowledge or information to form a belief
3 as to the truth of the allegations asserted and therefore deny the allegations.

4 64. Although Defendants generally believes the allegations contained in Paragraph 64 of
5 the Complaint to be true, Defendants are without sufficient knowledge or information to form a belief
6 as to the truth of the allegations asserted and therefore deny the allegations.

7 65. Although Defendants generally believes the allegations contained in Paragraph 65 of
8 the Complaint to be true, Defendants are without sufficient knowledge or information to form a belief
9 as to the truth of the allegations asserted and therefore deny the allegations.

10 66. Although Defendants generally believes the allegations contained in Paragraph 66 of
11 the Complaint to be true, Defendants are without sufficient knowledge or information to form a belief
12 as to the truth of the allegations asserted and therefore deny the allegations.

13 67. Although Defendants generally believes the allegations contained in Paragraph 67 of
14 the Complaint to be true, Defendants are without sufficient knowledge or information to form a belief
15 as to the truth of the allegations asserted and therefore deny the allegations.

16 68. Although Defendants generally believes the allegations contained in Paragraph 68 of
17 the Complaint to be true, Defendants are without sufficient knowledge or information to form a belief
18 as to the truth of the allegations asserted and therefore deny the allegations.

19 69. Although Defendants generally believes the allegations contained in Paragraph 69 of
20 the Complaint to be true, Defendants are without sufficient knowledge or information to form a belief
21 as to the truth of the allegations asserted and therefore deny the allegations.

22 70. Although Defendants generally believes the allegations contained in Paragraph 70 of
23 the Complaint to be true, Defendants are without sufficient knowledge or information to form a belief
24 as to the truth of the allegations asserted and therefore deny the allegations.

25 71. Although Defendants generally believes the allegations contained in Paragraph 71 of
26 the Complaint to be true, Defendants are without sufficient knowledge or information to form a belief
27 as to the truth of the allegations asserted and therefore deny the allegations.

28

1 72. Although Defendants generally believes the allegations contained in Paragraph 72 of
2 the Complaint to be true, Defendants are without sufficient knowledge or information to form a belief
3 as to the truth of the allegations asserted and therefore deny the allegations.

4 73. Although Defendants generally believes the allegations contained in Paragraph 73 of
5 the Complaint to be true, Defendants are without sufficient knowledge or information to form a belief
6 as to the truth of the allegations asserted and therefore deny the allegations.

7 74. Although Defendants generally believes the allegations contained in Paragraph 74 of
8 the Complaint to be true, Defendants are without sufficient knowledge or information to form a belief
9 as to the truth of the allegations asserted and therefore deny the allegations.

10 75. Although Defendants generally believes the allegations contained in Paragraph 75 of
11 the Complaint to be true, Defendants are without sufficient knowledge or information to form a belief
12 as to the truth of the allegations asserted and therefore deny the allegations.

13 76. Although Defendants generally believes the allegations contained in Paragraph 76 of
14 the Complaint to be true, Defendants are without sufficient knowledge or information to form a belief
15 as to the truth of the allegations asserted and therefore deny the allegations.

16 77. Although Defendants generally believes the allegations contained in Paragraph 77 of
17 the Complaint to be true, Defendants are without sufficient knowledge or information to form a belief
18 as to the truth of the allegations asserted and therefore deny the allegations.

19 78. Although Defendants generally believes the allegations contained in Paragraph 78 of
20 the Complaint to be true, Defendants are without sufficient knowledge or information to form a belief
21 as to the truth of the allegations asserted and therefore deny the allegations.

22 79. Although Defendants generally believes the allegations contained in Paragraph 79 of
23 the Complaint to be true, Defendants are without sufficient knowledge or information to form a belief
24 as to the truth of the allegations asserted and therefore deny the allegations.

25 80. Although Defendants generally believes the allegations contained in Paragraph 80 of
26 the Complaint to be true, Defendants are without sufficient knowledge or information to form a belief
27 as to the truth of the allegations asserted and therefore deny the allegations.

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1 81. Although Defendants generally believes the allegations contained in Paragraph 81 of
2 the Complaint to be true, Defendants are without sufficient knowledge or information to form a belief
3 as to the truth of the allegations asserted and therefore deny the allegations.

4 82. In response to Paragraph 82, Defendants state that such paragraph contains statements
5 or conclusions of law to which no response is required.

6 83. In response to Paragraph 83, Defendants state that such paragraph contains statements
7 or conclusions of law to which no response is required.

8 84. Answering the allegations of paragraph 84, Defendants deny each and every
9 allegation set forth therein.

10 85. Although Defendants generally believes the allegations contained in Paragraph 85 of
11 the Complaint to be true, Defendants are without sufficient knowledge or information to form a belief
12 as to the truth of the allegations asserted and therefore deny the allegations.

13 86. Although Defendants generally believes the allegations contained in Paragraph 86 of
14 the Complaint to be true, Defendants are without sufficient knowledge or information to form a belief
15 as to the truth of the allegations asserted and therefore deny the allegations.

16 87. Although Defendants generally believes the allegations contained in Paragraph 87 of
17 the Complaint to be true, Defendants are without sufficient knowledge or information to form a belief
18 as to the truth of the allegations asserted and therefore deny the allegations.

19 88. Although Defendants generally believes the allegations contained in Paragraph 88 of
20 the Complaint to be true, Defendants are without sufficient knowledge or information to form a belief
21 as to the truth of the allegations asserted and therefore deny the allegations.

22 89. Although Defendants generally believes the allegations contained in Paragraph 89 of
23 the Complaint to be true, Defendants are without sufficient knowledge or information to form a belief
24 as to the truth of the allegations asserted and therefore deny the allegations.

25 90. Although Defendants generally believes the allegations contained in Paragraph 90 of
26 the Complaint to be true, Defendants are without sufficient knowledge or information to form a belief
27 as to the truth of the allegations asserted and therefore deny the allegations.

28

1 91. Although Defendants generally believes the allegations contained in Paragraph 91 of
2 the Complaint to be true, Defendants are without sufficient knowledge or information to form a belief
3 as to the truth of the allegations asserted and therefore deny the allegations.

4 92. Although Defendants generally believes the allegations contained in Paragraph 92 of
5 the Complaint to be true, Defendants are without sufficient knowledge or information to form a belief
6 as to the truth of the allegations asserted and therefore deny the allegations.

7 93. Although Defendants generally believes the allegations contained in Paragraph 93 of
8 the Complaint to be true, Defendants are without sufficient knowledge or information to form a belief
9 as to the truth of the allegations asserted and therefore deny the allegations.

10 94. Although Defendants generally believes the allegations contained in Paragraph 94 of
11 the Complaint to be true, Defendants are without sufficient knowledge or information to form a belief
12 as to the truth of the allegations asserted and therefore deny the allegations.

13 95. Although Defendants generally believes the allegations contained in Paragraph 95 of
14 the Complaint to be true, Defendants are without sufficient knowledge or information to form a belief
15 as to the truth of the allegations asserted and therefore deny the allegations.

16 96. Although Defendants generally believes the allegations contained in Paragraph 96 of
17 the Complaint to be true, Defendants are without sufficient knowledge or information to form a belief
18 as to the truth of the allegations asserted and therefore deny the allegations.

19 97. Although Defendants generally believes the allegations contained in Paragraph 97 of
20 the Complaint to be true, Defendants are without sufficient knowledge or information to form a belief
21 as to the truth of the allegations asserted and therefore deny the allegations.

22 98. Although Defendants generally believes the allegations contained in Paragraph 98 of
23 the Complaint to be true, Defendants are without sufficient knowledge or information to form a belief
24 as to the truth of the allegations asserted and therefore deny the allegations.

25 99. Although Defendants generally believes the allegations contained in Paragraph 99 of
26 the Complaint to be true, Defendants are without sufficient knowledge or information to form a belief
27 as to the truth of the allegations asserted and therefore deny the allegations.

28

1 100. Although Defendants generally believes the allegations contained in Paragraph 100
2 of the Complaint to be true, Defendants are without sufficient knowledge or information to form a
3 belief as to the truth of the allegations asserted and therefore deny the allegations.

4 101. Although Defendants generally believes the allegations contained in Paragraph 101
5 of the Complaint to be true, Defendants are without sufficient knowledge or information to form a
6 belief as to the truth of the allegations asserted and therefore deny the allegations.

7 102. Although Defendants generally believes the allegations contained in Paragraph 102
8 of the Complaint to be true, Defendants are without sufficient knowledge or information to form a
9 belief as to the truth of the allegations asserted and therefore deny the allegations.

10 103. Although Defendants generally believes the allegations contained in Paragraph 103
11 of the Complaint to be true, Defendants are without sufficient knowledge or information to form a
12 belief as to the truth of the allegations asserted and therefore deny the allegations.

13 104. In response to Paragraph 104, Defendants state that such paragraph contains
14 statements or conclusions of law to which no response is required.

15 105. In response to Paragraph 105, Defendants state that such paragraph contains
16 statements or conclusions of law to which no response is required.

17 106. In response to Paragraph 106 Defendants state that such paragraph contains
18 statements or conclusions of law to which no response is required.

19 107. In response to Paragraph 107, Defendants state that such paragraph contains
20 statements or conclusions of law to which no response is required.

21 108. In response to Paragraph 108, Defendants state that such paragraph contains
22 statements or conclusions of law to which no response is required.

23 109. In response to Paragraph 109, Defendants state that such paragraph contains
24 statements or conclusions of law to which no response is required.

25 110. Answering the allegations of paragraph 110, Defendants deny each and every
26 allegation set forth therein.

1 111. Answering the allegations of paragraph 111, Defendants are without sufficient
2 knowledge or information to form a belief as to the trust of the allegations asserted and therefore
3 deny the allegation.

4 112. In response to Paragraph 112, Defendants state that such paragraph contains
5 statements or conclusions of law to which no response is required.

6 113. In response to Paragraph 113, Defendants state that such paragraph contains
7 statements or conclusions of law to which no response is required.

8 114. Although Defendants generally believes the allegations contained in Paragraph 114
9 of the Complaint to be true, Defendants are without sufficient knowledge or information to form a
10 belief as to the truth of the allegations asserted and therefore deny the allegations.

11 115. Although Defendants generally believes the allegations contained in Paragraph 115
12 of the Complaint to be true, Defendants are without sufficient knowledge or information to form a
13 belief as to the truth of the allegations asserted and therefore deny the allegations.

14 116. Answering the allegations of paragraph 116, Defendants are without sufficient
15 knowledge or information to form a belief as to the truth of the allegations asserted and therefore
16 deny the allegations.

17 117. Answering the allegations of paragraph 117, Defendants are without sufficient
18 knowledge or information to form a belief as to the truth of the allegations asserted and therefore
19 deny the allegations.

20 118. Answering the allegations of paragraph 118, Defendants are without sufficient
21 knowledge or information to form a belief as to the truth of the allegations asserted and therefore
22 deny the allegations.

23 119. Answering the allegations of paragraph 119, Defendants are without sufficient
24 knowledge or information to form a belief as to the truth of the allegations asserted and therefore
25 deny the allegations.

26 120. In response to Paragraph 120, Defendants state that such paragraph contains
27 statements or conclusions of law to which no response is required.

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1 121. Answering the allegations of paragraph 121, Defendants are without sufficient
2 knowledge or information to form a belief as to the truth of the allegations asserted and therefore
3 deny the allegations.

4 122. Answering the allegations of paragraph 122, Defendants are without sufficient
5 knowledge or information to form a belief as to the truth of the allegations asserted and therefore
6 deny the allegations.

7 123. Answering the allegations of paragraph 123, Defendants are without sufficient
8 knowledge or information to form a belief as to the truth of the allegations asserted and therefore
9 deny the allegations.

10 124. Answering the allegations of paragraph 124, Defendants are without sufficient
11 knowledge or information to form a belief as to the truth of the allegations asserted and therefore
12 deny the allegations.

13 125. In response to Paragraph 125, Defendants state that such paragraph contains
14 statements or conclusions of law to which no response is required.

15 126. In response to Paragraph 126, Defendants deny each and every allegation set forth
16 therein.

17 127. Answering the allegations of paragraph 127, Defendants deny each and every
18 allegation set forth therein.

19 128. Answering the allegations of paragraph 128, Defendants deny each and every
20 allegation set forth therein.

21 129. Answering the allegations of paragraph 129, Defendants deny each and every
22 allegation set forth therein.

23 130. Answering the allegations of paragraph 130, Defendants deny each and every
24 allegation set forth therein.

25 131. Answering the allegations of paragraph 131, Defendants deny each and every
26 allegation set forth therein.

27 132. Answering the allegations of paragraph 132, Defendants deny each and every
28 allegation set forth therein.

1 133. Answering the allegations of paragraph 133, Defendants deny each and every
2 allegation set forth therein.

3 134. Answering the allegations of paragraph 134, Defendants deny each and every
4 allegation set forth therein.

5 135. Answering the allegations of paragraph 135, Defendants deny each and every
6 allegation set forth therein.

7 136. Answering the allegations of paragraph 136, Defendants deny each and every
8 allegation set forth therein.

9 137. Answering the allegations of paragraph 137, Defendants deny each and every
10 allegation set forth therein.

11 138. Answering the allegations of paragraph 138, Defendants deny each and every
12 allegation set forth therein.

13 139. Answering the allegations of paragraph 139 contain no new allegations and therefore
14 this incorporating allegation is admitted and denied as provided in the incorporated allegations.

15 140. Answering the allegations of paragraph 140, Defendants deny each and every
16 allegation set forth therein.

17 141. Answering the allegations of paragraph 141, Defendants deny each and every
18 allegation set forth therein.

19 142. Answering the allegations of paragraph 142, Defendants deny each and every
20 allegation set forth therein.

21 143. Answering the allegations of paragraph 143, Defendants deny each and every
22 allegation set forth therein.

23 144. Answering the allegations of paragraph 144, Defendants deny each and every
24 allegation set forth therein.

25 145. Answering the allegations of paragraph 145, Defendants deny each and every
26 allegation set forth therein.

27 146. Answering the allegations of paragraph 146, Defendants deny each and every
28 allegation set forth therein.

1 147. Answering the allegations of paragraph 147 contain no new allegations and therefore
2 this incorporating allegation is admitted and denied as provided in the incorporated allegations.

3 148. Answering the allegations of paragraph 148, Defendants deny each and every
4 allegation set forth therein.

5 149. Answering the allegations of paragraph 149, Defendants deny each and every
6 allegation set forth therein.

7 150. Answering the allegations of paragraph 150, Defendants deny each and every
8 allegation set forth therein.

9 151. Answering the allegations of paragraph 151, Defendants deny each and every
10 allegation set forth therein.

11 152. Answering the allegations of paragraph 152, Defendants deny each and every
12 allegation set forth therein.

13 153. Answering the allegations of paragraph 153, Defendants deny each and every
14 allegation set forth therein.

15 154. Answering the allegations of paragraph 154, Defendants deny each and every
16 allegation set forth therein.

17 155. Answering the allegations of paragraph 155, Defendants deny each and every
18 allegation set forth therein.

19 156. Answering the allegations of paragraph 156, Defendants deny each and every
20 allegation set forth therein.

21 157. Answering the allegations of paragraph 157, Defendants deny each and every
22 allegation set forth therein.

23 158. Answering the allegations of paragraph 158 contain no new allegations and therefore
24 this incorporating allegation is admitted and denied as provided in the incorporated allegations.

25 159. Answering the allegations of paragraph 159, Defendants deny each and every
26 allegation set forth therein.

27 160. Answering the allegations of paragraph 160, Defendants deny each and every
28 allegation set forth therein.

1 161. Answering the allegations of paragraph 161, Defendants deny each and every
2 allegation set forth therein.

3 162. Answering the allegations of paragraph 162 contain no new allegations and therefore
4 this incorporating allegation is admitted and denied as provided in the incorporated allegations.

5 163. Answering the allegations of paragraph 163, Defendants deny each and every
6 allegation set forth therein.

7 164. Answering the allegations of paragraph 164, Defendants deny each and every
8 allegation set forth therein.

9 165. Answering the allegations of paragraph 165, Defendants deny each and every
10 allegation set forth therein.

11 166. Answering the allegations of paragraph 166, Defendants deny each and every
12 allegation set forth therein.

13 167. Answering the allegations of paragraph 167, Defendants deny each and every
14 allegation set forth therein.

15 168. Answering the allegations of paragraph 168, Defendants deny each and every
16 allegation set forth therein.

17 169. Answering the allegations of paragraph 169 contain no new allegations and therefore
18 this incorporating allegation is admitted and denied as provided in the incorporated allegations.

19 170. Answering the allegations of paragraph 170, Defendants deny each and every
20 allegation set forth therein.

21 171. Answering the allegations of paragraph 171, Defendants deny each and every
22 allegation set forth therein.

23 172. Answering the allegations of paragraph 172, Defendants deny each and every
24 allegation set forth therein.

25 173. Answering the allegations of paragraph 173, Defendants deny each and every
26 allegation set forth therein.

27 174. Answering the allegations of paragraph 174, Defendants deny each and every
28 allegation set forth therein.

1 175. Answering the allegations of paragraph 174, Defendants deny each and every
2 allegation set forth therein.

3 176. Answering the allegations of paragraph 176 contain no new allegations and therefore
4 this incorporating allegation is admitted and denied as provided in the incorporated allegations.

5 177. Answering the allegations of paragraph 177, Defendants deny each and every
6 allegation set forth therein.

7 178. Answering the allegations of paragraph 178, Defendants deny each and every
8 allegation set forth therein.

9 179. Answering the allegations of paragraph 179, Defendants deny each and every
10 allegation set forth therein.

11 180. Answering the allegations of paragraph 180, Defendants deny each and every
12 allegation set forth therein.

13 181. Answering the allegations of paragraph 181, Defendants deny each and every
14 allegation set forth therein.

15 182. Answering the allegations of paragraph 182, Defendants deny each and every
16 allegation set forth therein.

17 183. Answering the allegations of paragraph 183, Defendants deny each and every
18 allegation set forth therein.

19 184. Answering the allegations of paragraph 184, Defendants deny each and every
20 allegation set forth therein.

21 185. Answering the allegations of paragraph 185, Defendants deny each and every
22 allegation set forth therein.

23 186. Answering the allegations of paragraph 186, Defendants deny each and every
24 allegation set forth therein.

25 187. Answering the allegations of paragraph 187, Defendants deny each and every
26 allegation set forth therein.

27 188. Answering the allegations of paragraph 188 contain no new allegations and therefore
28 this incorporating allegation is admitted and denied as provided in the incorporated allegations.

1 189. Answering the allegations of paragraph 189, Defendants deny each and every
2 allegation set forth therein.

3 190. Answering the allegations of paragraph 190, Defendants deny each and every
4 allegation set forth therein.

5 191. Answering the allegations of paragraph 191, Defendants deny each and every
6 allegation set forth therein.

7 192. Answering the allegations of paragraph 192 contain no new allegations and therefore
8 this incorporating allegation is admitted and denied as provided in the incorporated allegations.

9 193. Answering the allegations of paragraph 193, Defendants deny each and every
10 allegation set forth therein.

11 194. Answering the allegations of paragraph 194, Defendants deny each and every
12 allegation set forth therein.

13 195. Answering the allegations of paragraph 195, Defendants deny each and every
14 allegation set forth therein.

15 196. Answering the allegations of paragraph 196, Defendants deny each and every
16 allegation set forth therein.

17 197. Answering the allegations of paragraph 197, Defendants deny each and every
18 allegation set forth therein.

19 198. Answering the allegations of paragraph 198, Defendants deny each and every
20 allegation set forth therein.

21 199. Answering the allegations of paragraph 199, Defendants deny each and every
22 allegation set forth therein.

23 200. Answering the allegations of paragraph 200, Defendants deny each and every
24 allegation set forth therein.

25 201. Answering the allegations of paragraph 201, Defendants deny each and every
26 allegation set forth therein.

27 202. Answering the allegations of paragraph 202, Defendants deny each and every
28 allegation set forth therein.

1 203. Answering the allegations of paragraph 203, Defendants deny each and every
2 allegation set forth therein.

3 204. Answering the allegations of paragraph 204, Defendants deny each and every
4 allegation set forth therein.

5 205. Answering the allegations of paragraph 205, Defendants deny each and every
6 allegation set forth therein.

7 206. Answering the allegations of paragraph 206, Defendants deny each and every
8 allegation set forth therein.

9 207. Answering the allegations of paragraph 207, Defendants deny each and every
10 allegation set forth therein.

11 208. Answering the allegations of paragraph 208 contain no new allegations and therefore
12 this incorporating allegation is admitted and denied as provided in the incorporated allegations.

13 209. Answering the allegations of paragraph 209, Defendants deny each and every
14 allegation set forth therein.

15 210. Answering the allegations of paragraph 210, Defendants deny each and every
16 allegation set forth therein.

17 211. Answering the allegations of paragraph 211, Defendants deny each and every
18 allegation set forth therein.

19 212. Answering the allegations of paragraph 212, Defendants deny each and every
20 allegation set forth therein.

21 213. Answering the allegations of paragraph 213, Defendants deny each and every
22 allegation set forth therein.

23 214. Answering the allegations of paragraph 214, Defendants deny each and every
24 allegation set forth therein.

25 215. Answering the allegations of paragraph 215, Defendants deny each and every
26 allegation set forth therein.

27 216. Answering the allegations of paragraph 216, Defendants deny each and every
28 allegation set forth therein.

1 217. Answering the allegations of paragraph 217, Defendants deny each and every
2 allegation set forth therein.

3 218. Answering the allegations of paragraph 218, Defendants deny each and every
4 allegation set forth therein.

5 219. Answering the allegations of paragraph 219, Defendants deny each and every
6 allegation set forth therein.

7 220. Answering the allegations of paragraph 220, Defendants deny each and every
8 allegation set forth therein.

9 221. Answering the allegations of paragraph 221 contain no new allegations and therefore
10 this incorporating allegation is admitted and denied as provided in the incorporated allegations.

11 222. Answering the allegations of paragraph 222, Defendants deny each and every
12 allegation set forth therein.

13 223. Answering the allegations of paragraph 223, Defendants deny each and every
14 allegation set forth therein.

15 224. Answering the allegations of paragraph 224, Defendants deny each and every
16 allegation set forth therein.

17 225. Answering the allegations of paragraph 225, Defendants deny each and every
18 allegation set forth therein.

19 226. Answering the allegations of paragraph 226, Defendants deny each and every
20 allegation set forth therein.

21 227. Answering the allegations of paragraph 227, Defendants deny each and every
22 allegation set forth therein.

23 228. Answering the allegations of paragraph 228, Defendants deny each and every
24 allegation set forth therein.

25 229. Answering the allegations of paragraph 229, Defendants deny each and every
26 allegation set forth therein.

27 230. Answering the allegations of paragraph 230, Defendants deny each and every
28 allegation set forth therein.

1 231. Answering the allegations of paragraph 231, Defendants deny each and every
2 allegation set forth therein.

3 232. Answering the allegations of paragraph 232, Defendants deny each and every
4 allegation set forth therein.

5 233. Answering the allegations of paragraph 233, Defendants deny each and every
6 allegation set forth therein.

7 234. Answering the allegations of paragraph 234, Defendants deny each and every
8 allegation set forth therein.

9 235. Answering the allegations of paragraph 235, Defendants deny each and every
10 allegation set forth therein.

11 236. Answering the allegations of paragraph 236, Defendants deny each and every
12 allegation set forth therein.

13 237. Answering the allegations of paragraph 237, Defendants deny each and every
14 allegation set forth therein.

15 238. Answering the allegations of paragraph 238, Defendants deny each and every
16 allegation set forth therein.

17 239. Answering the allegations of paragraph 239, Defendants deny each and every
18 allegation set forth therein.

19 240. Answering the allegations of paragraph 240, Defendants deny each and every
20 allegation set forth therein.

21 241. Answering the allegations of paragraph 241, Defendants deny each and every
22 allegation set forth therein.

23 242. Answering the allegations of paragraph 242, Defendants deny each and every
24 allegation set forth therein.

25 243. Answering the allegations of paragraph 243 contain no new allegations and therefore
26 this incorporating allegation is admitted and denied as provided in the incorporated allegations.

27 244. Answering the allegations of paragraph 244, Defendants deny each and every
28 allegation set forth therein.

1 245. Answering the allegations of paragraph 245, Defendants deny each and every
2 allegation set forth therein.

3 246. Answering the allegations of paragraph 246, Defendants deny each and every
4 allegation set forth therein.

5 247. Answering the allegations of paragraph 247, Defendants deny each and every
6 allegation set forth therein.

7 248. Answering the allegations of paragraph 248, Defendants deny each and every
8 allegation set forth therein.

9 **AFFIRMATIVE DEFENSES**

10 Defendants further pleads the following separate and additional affirmative defenses. By
11 pleading these defenses, Defendants do not in any way agree or concede that Defendant has the
12 burden of proof or persuasion on any of these issues. Defendants reserves the right to assert such
13 additional affirmative defenses as discovery or subsequent events in this case indicate are proper.

14 **FIRST AFFIRMATIVE DEFENSE**

15 (Failure to State a Claim for Relief)

16 The Complaint, and each claim for relief set forth therein, fail to state a claim or cause of
17 action, or sufficient facts, upon which relief can be granted.

18 **SECOND AFFIRMATIVE DEFENSE**

19 (Failure to Mitigate)

20 Plaintiff is barred, in whole or in part, from recovering damages in this action due to Plaintiff's
21 failure to mitigate his alleged damages, though Defendants deny that Plaintiff has sustained any
22 damages at all. Plaintiff failed to take reasonable steps to mitigate and/or or avoid Plaintiff's alleged
23 damages, if any, and or delayed unreasonably in doing so. Had Plaintiff timely and diligently taken
24 reasonable steps to mitigate and/or avoid Plaintiff's alleged damages, and not exacerbated his
25 damages, if any, such damages would have been reduced or eliminated altogether.

1 **THIRD AFFIRMATIVE DEFENSE**

2 (Waiver/Release)

3 Plaintiff is barred, in whole or in part, from recovering damages in this action because he has
4 waived or released the right, if any, to pursue those claims by reason of Plaintiff's own actions and
5 course of conduct.

6 **FOURTH AFFIRMATIVE DEFENSE**

7 (No Damages)

8 Plaintiff is barred, in whole or in part, from recovering damages in this action because Plaintiff
9 has not suffered any damages as a result of any act or omission of Defendants.

10 **FIFTH AFFIRMATIVE DEFENSE**

11 (Plaintiff's Own Conduct/Comparative Fault)

12 Plaintiff is barred, in whole or in part, from recovering damages in this action to the extent
13 any of the alleged wrongs, or the acts or omissions, were by, or were the result of, Plaintiff's own
14 conduct and, as a consequence, the Plaintiff contributed to any damage he claims he sustained.

15 **SIXTH AFFIRMATIVE DEFENSE**

16 (No Proximate Cause)

17 Plaintiff is barred, in whole or in part, from recovering damages in this action because the
18 losses that Plaintiff allegedly suffered were not proximately caused by any act or omission by
19 Defendants.

20 **SEVENTH AFFIRMATIVE DEFENSE**

21 (Defendant Acted Reasonably)

22 Plaintiff is barred, in whole or in part, from recovering damages in this action because
23 Defendants acted reasonably under the circumstances applicable, and in addition acted without
24 committing a fraud or defalcation and without acting in a manner that willfully or maliciously caused
25 injury to Plaintiff.

EIGHTH AFFIRMATIVE DEFENSE

(Unclean Hands)

Plaintiff is barred, in whole or in part, from recovering damages in this action by the doctrine of unclean hands, due to the acts, omissions, and/or knowledge of Plaintiff.

NINTH AFFIRMATIVE DEFENSE

(Laches)

Plaintiff is barred, in whole or in part, from recovering damages in this action by the doctrine of laches.

TENTH AFFIRMATIVE DEFENSE

(Work, Labor, and Services Rendered at the Special Instance of Plaintiff)

Plaintiff is barred, in whole or in part, from recovering damages in this action because Plaintiff specifically asked for the services from Defendants and received the benefit of those services from Defendants.

ELEVENTH AFFIRMATIVE DEFENSE

(In Pari Delicto)

The wrongful acts of the Debtor, which can be imputed to the Plaintiff, prevents the Plaintiff from recovering from the Defendants under the doctrine of *in pari delicto*.

TWELFTH AFFIRMATIVE DEFENSE

(Contemporaneous Exchange for New Value)

Defendants provided value at the same time or almost at the same time as they received the transfers alleged in the Complaint.

THIRTEENTH AFFIRMATIVE DEFENSE

(Subsequent New Value)

Defendants allege that they subsequently provided new value for the benefit of the bankruptcy estate.

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1 **FOURTEENTH AFFIRMATIVE DEFENSE**

2 (Ordinary Course)

3 Defendants assert that transfers they received were made in the ordinary course of business
4 of the Debtor and the Defendants.

5 **FIFTEENTH AFFIRMATIVE DEFENSE**

6 (Good Faith/For Value)

7 Defendants assert they took funds from the Debtor in good faith and for reasonably equivalent
8 value for the benefits they provided.

9 **PRAYER FOR RELIEF**

10 WHEREFORE, Defendants pray for relief as follows:

11 A. That the Complaint be dismissed with prejudice and in its entirety;

12 B. That Plaintiff take nothing by reason of its Complaint and that judgment be entered
13 against Plaintiff and in Defendants' favor;

14 C. That Defendants be awarded the costs incurred in defending this action, together with
15 any legal fees to which Defendants might be entitled to by law; and

16 D. That Defendants be granted such further and additional relief as the Court may deem
17 just and proper.

18 Dated: August 18, 2025

GOLDEN GOODRICH LLP

19
20 By: /s/ David M. Goodrich

21 David M. Goodrich
22 Anerio V. Altman
23 Attorneys for Defendant
24
25
26
27
28

PROOF OF SERVICE OF DOCUMENT

I am over the age of 18 and not a party to this bankruptcy case or adversary proceeding. My business address is:

3070 Bristol St., Suite 640, Costa Mesa, CA 92626

A true and correct copy of the foregoing document entitled (*specify*): **CERTAIN DEFENDANTS' ANSWER TO TRUSTEE'S AMENDED COMPLAINT FOR: (1) AVOIDANCE, RECOVERY, AND PRESERVATION OF PREFERENTIAL TRANSFERS MADE TO OR FOR CERTAIN DEFENDANTS MADE WITHIN NINETY DAYS OF THE PETITION DATE; (2) (2) AVOIDANCE, RECOVERY, AND PRESERVATION OF POST-PETITION TRANSFERS MADE TO OR FOR THE BENEFIT OF CERTAIN DEFENDANTS; (3) (2) AVOIDANCE OF DEBTOR'S EXECUTION OF REPAYMENT AGREEMENT WITH DEFENDANT OXFORD KNOW, LLC PURSUANT TO 11 U.S.C. §§ 548(A), 550, AND 551; (4) AVOIDANCE, RECOVERY, AND PRESERVATION OF FRAUDULENT TRANSFER(S) PURSUANT TO 11 U.S.C. §§ 548(A), 550, AND 551; (5) AVOIDANCE, RECOVERY, AND PRESERVATION OF FRAUDULENT TRANSFER(S) PURSUANT TO 11 U.S.C. §§ 548(A), 550, AND 551; (6) AVOIDANCE, PRESERVATION, AND RECOVERY OF VOIDABLE TRANSFERS MADE WITH INTENT TO DEFRAUD [11 U.S.C. §§ 548. (A), 550, AND 551; CAL. CIV. CODE §§ 3439.04(A)(2), 3439.05, AND 3439.07] (7) AVOIDANCE, PRESERVATION, AND RECOVERY OF VOIDABLE TRANSFERS MADE WITH NO INTENT TO DEFRAUD [11 U.S.C. §§ 548(A), 550, AND 551; CAL. CIV. CODE §§ 3439.04(A)(2), 3439.05, AND 3439.07] (8) AVOIDANCE, RECOVERY, AND PRESERVATION OF FRAUDULENT TRANSFERS MADE TO OR FOR THE BENEFIT OF DEFENDANTS GILANI AND DOVALINA ARISING FROM USE OF AMERICAN EXPRESS CARD; AND (9) OBJECTION TO PROOF OF CLAIM NO 818 OF OXFORD KNOW, LLC** will be served or was served (a) on the judge in chambers in the form and manner required by LBR 5005-2(d); and (b) in the manner indicated below:

1. TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF): Pursuant to controlling General Orders and LBR, the foregoing document will be served by the court via NEF and hyperlink to the document. On (*date*) **August 18, 2025**, I checked the CM/ECF docket for this bankruptcy case or adversary proceeding and determined that the following persons are on the Electronic Mail Notice List to receive NEF transmission at the email addresses stated below:
Leslie A Cohen leslie@lesliecohenlaw.com, jaime@lesliecohenlaw.com; bryn@lesliecohenlaw.com
Yosina M Lissebeck Yosina.Lissebeck@Dinsmore.com, caron.burke@dinsmore.com; ayrton.celentino@dinsmore.com
Richard A Marshack (TR) pkraus@marshackhays.com, ecf.alert+Marshack@titlexi.com
Tyler Powell tyler.powell@dinsmore.com, lydia.tharp@dinsmore.com; wendy.yones@dinsmore.com
United States Trustee (SA) ustregion16.sa.ecf@usdoj.gov

2. SERVED BY UNITED STATES MAIL:

On (*date*) **August 18, 2025**, I served the following persons and/or entities at the last known addresses in this bankruptcy case or adversary proceeding by placing a true and correct copy thereof in a sealed envelope in the United States mail, first class, postage prepaid, and addressed as follows. Listing the judge here constitutes a declaration that mailing to the judge will be completed no later than 24 hours after the document is filed.

Honorable Scott C. Clarkson
United States Bankruptcy Court
Central District of California
411 W. 4th St., Ste 5130/Ctrm 5C
Santa Ana, CA 92701-4593

3. SERVED BY PERSONAL DELIVERY, OVERNIGHT MAIL, FACSIMILE TRANSMISSION OR EMAIL (state method for each person or entity served): Pursuant to F.R.Civ.P. 5 and/or controlling LBR, on (*date*) _____, I served the following persons and/or entities by personal delivery, overnight mail service, or (for those who consented in writing to such service method), by facsimile transmission and/or email as follows. Listing the judge here constitutes a declaration that personal delivery on, or overnight mail to, the judge will be completed no later than 24 hours after the document is filed.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

August 18, 2025

Date

David M. Fitzgerald

Printed Name


Signature